

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

SHANE M. HAFHEY,

Case No. 3:19-bk-03711-JAF
Chapter 11

Debtor.

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MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD

COMES NOW, Thomas C. Adam of the Adam Law Group P.A., pursuant to LBR 2091-2, and files this Motion for Leave to Withdrawal as counsel for Debtor, SHANE M. HAFHEY, and respectfully moves this Court to enter an order excusing the undersigned counsel from further representation of the Debtor in this matter, and in support thereof would show:

1. On or about September 30th, 2019, the undersigned was retained as counsel of record for the Debtor.
2. Pursuant to the Florida Rules of Professional Conduct, Rule 4-1.16, good cause exists to terminate representation of the Debtor due to irreconcilable differences that have arisen between the Debtor and the undersigned counsel, and, as a result, it is inappropriate for the undersigned to continue to represent the Debtor.
3. The undersigned has informed the Debtor of counsel's intent to withdraw.
4. No party will be prejudiced by the undersigned withdrawing as counsel of record in the above captioned case.
5. The Debtor can receive all further pleadings, notices and correspondence at the following address:

**SHANE HAFHEY
2083 NW 165th Ct. Rd.
Dunnellon, Florida 34432**

WHEREFORE, attorney Thomas C. Adam, of the Adam Law Group P.A. respectfully requests that this Honorable Court grant the Motion for Leave to Withdraw as counsel in this matter and excuse Thomas C. Adam and from further representation of the Debtor.

/s/ Thomas C. Adam

Thomas C. Adam
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